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8 Attorneys for Defendants  
9 Robert Gomez, Gomez & Associates, Inc.  
10 and Rock'n Rob Enterprises

11

12 **UNITED STATES DISTRICT COURT**

13 **DISTRICT OF NEVADA**

14 UNITED STATES OF AMERICA, )  
15 Plaintiff, )  
16 vs. )  
17 PCPLV LLC d/b/a Pinnacle. )  
18 Compounding Pharmacy, Ofir Ventura, )  
19 Cecilia Ventura, Brandon Jimenez, Robert )  
20 Gomez, Gomez & Associates, Inc., Rock'n )  
21 Rob Enterprises, Amir Shalev, D.P.M., AS )  
22 Enterprises, Inc., and Ivan Lee Goldsmith, )  
23 M.D. )  
24 Defendants. )

25 Case no.: 2:21-cv-00184-JCM-DJA

26 **STIPULATION AND [PROPOSED]**  
**ORDER TO EXTEND TIME TO**  
**RESPOND TO COMPLAINT**

27 (First Request)

28 **STIPULATION AND [PROPOSED] ORDER TO**

1 **EXTEND TIME TO RESPOND TO COMPLAINT**

2 Plaintiff, the United States of America, and Defendants Robert Gomez, Gomez &  
3 Associates, Inc., and Rock'n Rob Enterprises ("Defendants") stipulate to extend the time by  
4 which Defendants may respond to the Complaint in this action by 14 days from February 13,  
5 2024 to February 27, 2024, and in support thereof, say:

6 1. Plaintiff filed their Complaint in this action on February 2, 2021.

7 2. Defendant, Robert Gomez was served with the Complaint in this on or about

8 January 23, 2024.

9 3. There is good cause to extend the time by which Defendants may respond to the

10 Complaint in this action because counsel for Defendants are 1) hoping for a resolution; and 2)

11 were only recently retained by Defendants in relation to this action and require additional time to

1 investigate facts and circumstances pleaded in the Complaint prior to filing Defendants'  
2 responses.

3       4. Based upon Defendants' request, the Parties have agreed to extend the deadline by  
4 which Defendants may respond to the Complaint by 14 days from February 13, 2024 to February  
5 27, 2024, subject to the Court's approval.

6       5. Defendants have not previously requested an extension of the deadline to respond  
7 to the Complaint.

8           **IT IS SO STIPULATED**

9           Dated this 7th day of February, 2024.

10          Christian Ruiz  
11          U.S. Attorney's Office

12          /s/ Christian Ruiz

13          \_\_\_\_\_  
14          CHRISTIAN RUIZ  
United States of America Assistant  
Attorney

Dated this 7th day of February, 2024.

David T. Brown  
Brown, Brown & Premsrirut

/s/ David T. Brown

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DAVID T. BROWN  
Counsel for Defendants

16           **IT IS SO ORDERED**

17            
UNITED STATES MAGISTRATE JUDGE

18          Dated: 2/8/2024

1  
2                   **CERTIFICATE OF SERVICE**  
3

4                   I HEREBY CERTIFY that on February 7, 2024, I electronically filed the foregoing  
5 document with the Clerk of the Court using CM/EMF. I also certify that a true and correct copy  
6 of the foregoing document is being served via transmission of Notices of Electronic Filing  
7 generated by CM/EMF.  
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9                   /s/ Alexis Budner  
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11                   \_\_\_\_\_  
12                   ALEXIS BUDNER  
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